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12  
13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 B DIAMOND INFRA LLC,

16 Plaintiff,

17 v.

18 CARMEN FERCH, AS TRUSTEE OF  
19 THE CARMEN FERCH TRUST, and the  
20 FEDERAL AVIATION  
21 ADMINISTRATION,

22 Defendants.

23 Case No. 3:22-cv-00443-LRH-CSD

24 **Stipulation to Extend the United States'**  
25 **Deadline to Answer**

26 **(Fourth Request)**

27 Pursuant to Local Rule IA 6-1, the parties stipulate and request that Defendants  
28 shall have a 30-day extension of time to file an answer or otherwise respond to Plaintiff's  
Complaint (ECF No. 1). The current deadline to answer is **April 10, 2023**. This is the  
Parties' fourth request for extension.

29 This matter involves a complex real property issue connected to an easement and a  
30 lease held by the Federal Aviation Administration for critical aviation communications  
31 infrastructure. The parties have worked diligently to verify important facts, discuss this  
32 matter with interested parties, and determine whether they can resolve this matter without  
33 litigation. They have circulated a draft stipulation that will resolve this matter which is  
34 being considered by the various parties.

35 One component of the resolution is a proposed negotiated lease between the Federal  
36 Aviation Administration (FAA) and B Diamond Infra. B Diamond has proposed lease

1 terms which are being considered by the FAA and the parties are negotiating a draft lease.  
2 The parties continue to negotiate in good faith.

3 The parties agree that a 30-day extension of the answer deadline is appropriate  
4 under the circumstances. This stipulation is filed in good faith and not for the purpose of  
5 delay.

6 WHEREFORE, the parties respectfully requests that this stipulation be granted and  
7 that the deadline to respond to the complaint be extended through and including **May 10,**  
8 **2023.**

9 Respectfully submitted this 7th day of April 2023.

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11 HOLLAND & HART LLP

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*Attorney for Defendant Carmen Ferch as  
Trustee of the Carmen Ferch Trust*

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IT IS SO ORDERED:

25   
26 UNITED STATES MAGISTRATE JUDGE

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28 DATED: April 10, 2023